

Aventis CropScience



Via Federal Express Delivery

August 31, 2000

Ms. Joanne I. Miller
Product Manager 23
Document Processing Desk - AMEND
Office of Pesticide Programs (7505C)
U. S. Environmental Protection Agency
Crystal Mall 2
1921 Jefferson Davis Highway
Arlington VA, 22202

452044-00

Subject: Liberty® Herbicide
EPA Registration Number 264-660
Petition to Amend Registration of Liberty® Herbicide to
Include Use on Rice

Dear Ms. Miller:

Attached with this cover is our request to amend the tolerance for glufosinate-ammonium to include rice commodities and register the use of Liberty® Herbicide to control weeds in rice. This represents a new use for Liberty Herbicide in addition to the corn, soybean, canola and sugar beet uses already approved by the Agency. This use of Liberty Herbicide offers significant advantages to existing rice cultural practices including:

- replacement of older, high use-rate products thereby reducing the amount of herbicides applied to rice fields on a per acre basis.
- control of red rice, a serious weed problem that is not controlled by herbicides presently registered for use on rice.
- improved quality of the water released from rice paddies, particularly where the fields are cultivated under water.

Because of these and other benefits, Aventis CropScience will submit in the near future a Reduced Risk Rationale for the use of Liberty Herbicide in rice culture.

Submitted with this letter in support of our request are the following:

- Application for Pesticide (EPA Form 8570-1).
- Certification with Respect to Citation of Data (EPA Form 8570-34).
- Data Matrix for Internal EPA use (EPA Form 8570-35).

- A blackened copy of the Data Matrix form for public use.
- Five (5) copies of the proposed Liberty Herbicide label containing a new "Application Directions for Use on Rice" section.
- One copy of the proposed Liberty Herbicide label in which changes made to the label most recently stamped by EPA (Aug. 2, 2000) are highlighted in yellow to facilitate review of label.
- Three (3) copies of the Petition for Tolerance in or on Rice Commodities.
- Copy of the check for tolerance fees, which has been sent to EPA Headquarters Accounting Operations Branch in Pittsburgh, PA.
- Three copies of the Transmittal Document (Document 1 of 11)
- Three copies of the studies supporting this registration request (Documents 2 through 11).
- A publicly releasable Notice of Filing. A hard copy of this notice is included as are electronic versions of the document on a diskette. The diskette contains two files: "NOF_RICE.TXT" as an ASCII text file and "NOF Rice WP.wpf" as a version saved in Word Perfect 5 format.

This use of glufosinate-ammonium when considered with other registered uses or uses pending Agency approval meet the safety criteria of the Food Quality Protection Act. The mammalian toxicology data base and exposure assessments support a determination that no harm will result from aggregate exposure to glufosinate-ammonium.

A check in the amount of \$18,625.00 to cover the tolerance fee has been sent via certified mail to: Environmental Protection Agency headquarters Accounting Operations Branch, Office of Pesticide Programs (Tolerance Fees), P. O. Box 360277M, Pittsburgh, PA 15251. A copy of this check is attached.

Please contact me if you have questions regarding our request or require additional information.

Sincerely,

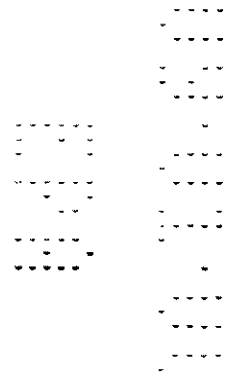


Paul A. Cain, Ph. D
Registration Manager

Phone: (919) 549-2582

Fax: (919) 549-2545

e-mail: paul.cain@aventis.com



TRANSMITTAL DOCUMENT

**Liberty Herbicide
EPA Registration Number 264-660**

**Data in Support of Application for Registration on Rice
and Petition for Tolerance on Rice Commodities**

TRANSMITTAL DATE

August 31, 2000

Company Official: Paul A. Cain (Signature)
Company Name: Aventis CropScience
Company Contact: Paul A. Cain, Ph. D.
Telephone: (919) 549-2582

Document 1 of 11

Page 1 of 3

Aventis CropScience USA LP
P.O. Box 12014
2 T.W. Alexander Drive
Research Triangle Park, N.C. 27709

BIBLIOGRAPHY OF SUBMITTED DATA

Document 1 of 11

Transmittal Document

Document 2 of 11

MRID Number: REJECT (01)

Stumpf, K.; 1993. Anaerobic Aquatic Metabolism of Glufosinate-ammonium in a Sandy Water Sediment System at Two Temperatures. Produktentwicklung GB-C, Okologie I Hoechst Aktiengesellschaft, D-65926 Frankfurt am Main. Project ID CB91/092. 56 pages.

Document 3 of 11

MRID Number: 45204401

Stumpf, K.; 1994. 1st Amendment to Report No. CB90/109. Aerobic Aquatic Metabolism of ¹⁴C-Labelled Glufosinate-ammonium in Two Water Sediment Systems at Different Application Rates. Identification of Unknown Metabolites. Hoechst Schering AgrEvo GmbH Umweltforschung, D-65926 Frankfurt am Main, Federal Republic of Germany. Project ID number CB90/109. 60 pages.

Document 4 of 11

MRID Number: 45204402

Stumpf, K.; 1994. Aerobic Aquatic Metabolism of 14 C-Labelled Glufosinate-ammonium in Two Water Sediment Systems at Different Application Rates. Hoechst Schering AgrEvo GmbH Umweltforschung, D-65926 Frankfurt am Main, Federal Republic of Germany. Project ID CB90/109. 75 pages.

Document 5 of 11

MRID Number: 45204403

Singer, S.S.; 2000. Aquatic Field Dissipation of Glufosinate-Ammonium Following Application of LIBERTY[®] at Highest Recommended Label Rates for Rice in Louisiana and California – USA, 1997. Aventis CropScience Residue Chemistry Department, P.O. Box 538, Pikeville, NC 27863. Study Number BK97R009. 202 pages.

Document 6 of 11

MRID Number: 45204404

Singer, S.S.; 2000. Residues of Glufosinate-Ammonium in Crops and Soil Irrigated with Water Drained from Fields Treated with Liberty[®] Herbicide in Louisiana and California, USA, 1997. Aventis CropScience Residue Chemistry Department, P.O. Box 538, Pikeville, NC 27863. Study Number BK97R011. 202 pages.

Document 7 of 11

MRID Number: 45204405

Rupprecht, J.K.; 2000. Metabolism of [14C]-Glufosinate-ammonium in Rice. Aventis CropScience Environmental Chemistry Department, P.O. Box 538, Pikeville, NC 27863. Study Number BK99E519. 200 pages.

Document 8 of 11

MRID Number: 45204406

Brady S.S.; 2000. Magnitude of Glufosinate-Ammonium Residues in or on Transgenic Rice Raw Agricultural Commodities Resulting from Two Applications of LIBERTY® Herbicide USA, 1999. Aventis CropScience Residue Chemistry Department, P.O. Box 538, Pikeville, NC 27863. Study Number BK99R001. 255 pages.

Document 9 of 11

MRID Number: 45204407

Brady S.S.; 2000. Magnitude of Glufosinate-Ammonium Residues in or on Transgenic Rice Raw Agricultural Commodities Resulting from Two Applications of LIBERTY® Herbicide USA, 1998. Aventis CropScience Residue Chemistry Department, P.O. Box 538, Pikeville, NC 27863. Study Number BK98R002. 66 pages.

Document 10 of 11

MRID Number: 45204408

Brady S.S.; 2000. Magnitude of Glufosinate-Ammonium Residues In or On Transgenic Rice Processed Commodities Resulting from Two Applications of LIBERTY® Herbicide USA, 1999. Aventis CropScience Residue Chemistry Department, P.O. Box 538, Pikeville, NC 27863. Study Number BK99R002. 158 pages.

Document 11 of 11

MRID Number: 45204409

Phillips, J.L.; 2000. Tier One Acute and Tier Two Chronic Dietary Exposure Analysis for Glufosinate Ammonium Rice Petition Including Drinking Water Estimated Concentration (DWECC) Comparison to Drinking Water Levels of Comparison (DWLOC). Aventis CropScience Residue Chemistry Department, P.O. Box 12018, Research Triangle Park, NC 27709. Study Identification Number Glufosinate-00-01. 24 pages.